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September 2, 2022

VIA ECF

Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Xiomian Zeng v. City of New York, et al.
Docket No.: 19-cv-03218 (JGK) (KHP)

Your Honor:

The undersigned, an associate of the law firm of Sim & Depaola, LLP, the attorneys for the Plaintiff Xiamin Zeng herein, respectfully submits this letter motion pursuant to Your Honor's Individual Practice Rule I(e), requesting a **four-week** extension of time to complete discovery, from **September 9, 2022** to **October 7, 2022** along with a concomitant extension of all other deadlines accordingly. This is the second motion for extension of time to complete discovery. The undersigned spoke with Mr. Frank who consented to this request.

The instant request is being made in order to afford Plaintiff opportunity to depose Defendants. Currently, Defendant Wiltshire's deposition has been tentatively noticed (pending Your Honor's decision on this application) for September 16, 2022. Defendant Febus, as per Counsel for Defendants, will be away on leave until September 11, 2022, and her availability for deposition will be ascertained upon her return. Accordingly, the instant four-week extension is being respectfully requested to accommodate the taking of the aforesaid depositions and any post deposition demands and exchanges.

Plaintiff's deposition is currently scheduled for September 8, 2022 which is one day before the current Court-Ordered close of discovery.

Plaintiff proposes extending the dates for filing: (i) dispositive motions, if any, from October 14, 2022 until November 11, 2022; and (ii) a joint pre-trial order, from November 4, 2022 until December 4, 2022, or 21 days after decision on any dispositive motion.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Sameer Nath

Sameer Nath, Esq.

Sim & DePaola, LLP

Attorneys for Plaintiff Xiamin Zeng